

**Simplot Responses to Agency Comments (June 2 and 21, 2016) on
“Addendum 08, Sampling and Analysis Plan (SAP) - Additional Small Mammal Sampling”
(April 2016 Submittal to the Agencies)**

General Comments:

GC-1 The addendum to sample small mammals in 2016 would not be necessary if the copper concentrations in small mammal tissue did not have the potential to be real; therefore, remove any reference which suggests that copper concentrations in small mammal tissues are an anomaly (i.e. “apparently anomalous”, “suspected anomalous”, etc.)

Response: The references to “anomalous” copper concentrations have been removed. Instead, the copper results are referenced as “questionable” or “high”.

Agency Response (June 21, 2016) to Simplot Response to GC-1: The continued use of subjective terms (i.e. questionable) averse to the high copper small mammal tissue concentration results at Smoky Canyon Mine is not appropriate for an objective, unbiased, and scientific Sampling and Analysis Plan with the stated objective to “confirm the presence/absence of high copper concentrations”.

Until 2016 small mammal tissue copper concentrations can “confirm the presence/absence of high copper concentrations” in small mammal tissue, then previous results should only be described as “high”.

Replace the term “questionable” with “high” (Section 1.0, page 1, paragraph two, last sentence and Section 1.3, page 3, paragraph one, last sentence).

Simplot Response to Agency Response (June 21, 2016): The term “questionable” has been replaced with “high” in the document.

Specific Comments:

SC-1 Page 3, Section 1.3, last paragraph: The logic of why the Pole Canyon ODA will not be resampled for small mammals is not clear. This ODA was the location of some of the highest concentrations of copper in small mammal tissue. Resampling the area following the removal action would provide some information on whether the cover is effective in reducing the uptake of contaminants by these small mammals. Sampling at Pole Canyon ODA is recommended.

Response: As requested by this comment, the two Pole Canyon ODA locations with high copper concentrations have been added to the sampling effort (see text, Table 1, and Figure 1). Note that construction of the new cover on the Pole Canyon ODA was completed in late 2015, and final repairs are being completed in June 2016. Now that a new cover is in place, the original small mammal sampling locations do not exist as the surface has been covered with at least 5 feet of Dinwoody and chert material. The two Pole Canyon ODA small mammal sampling locations will be situated as close to the original locations as feasible.

SC-2 Page 5, Section 2.2, 3rd paragraph, first sentence: Please specify the inhalant that will be used to euthanize small mammals.

Response: The inhalant used for the original RI sampling was carbon dioxide (CO₂); an inhalant was utilized because only a subset of the trapped small mammals were euthanized and submitted for tissue analysis. However, live trapping is not required for the additional sampling of small mammals, as all small mammals will be submitted for tissue analysis. For this reason, snap traps will be used instead of live traps. The text has been revised to reflect this, and SOP No. 26 (Small Mammal Tissue Sampling) has been updated accordingly.

SC-3 Page 5, Section 2.3: This section notes that the analysis of these samples will use the updated EPA Analytical Method 6020A. Note that at the Conda Mine when the analytical method was changed to 6020A, an increase in selenium concentrations was observed that ranged from 10-34% with an average increase of 17% from samples collected at the same sample locations. (The Conda sampling is in support of an ongoing study to confirm the effectiveness of proposed remedy.) It is recognized that this example noted a change in selenium concentrations. Has there been any similar changes in long term monitoring data of contaminants noted at the Smoky Canyon Mine?

Response: As shown in Table 2, the laboratory method for selenium analysis of small mammal tissue is EPA Method 7742, which is the same method used for the original analysis of selenium under the Smoky Canyon Mine RI for 2010 sample collection. There are no plans to change the selenium analysis method for the additional small mammal sampling (the method will be EPA Method 7742, as before). Therefore, this comment does not require a change to the SAP addendum. No long-term changes in tissue data, potentially attributable to changes in laboratory methods, have been noted at the Smoky Canyon Mine.

For the other analytes, except for mercury (to be analyzed using EPA Method 7471A, as before), analyses are planned using either EPA Method 6020A or 6010C (Table 2). The laboratory conducting the tissue analysis has indicated that analyzing by Method 6020A (ICP-MS) for these analytes is appropriate for a tissue matrix. Therefore, Simplot plans to allow the laboratory the flexibility to substitute EPA Method 6020A for 6010C (except for selenium and mercury) for analysis of small mammal tissue samples. Accordingly, a footnote has been added to Table 2.